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January 30, 2006

VIA HAND DELIVERY & EMAIL

Ms. Barbara A. Nann
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

VIA HAND DELIVERY & EMAIL

Mr. Gary G. Miller, Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

**RE: Site Access for the Gulfco Marine Maintenance, Inc. Superfund Site in
Freeport, Texas (the "Site"); CERCLA Docket No. 06-05-05**

Dear Ms. Nann and Mr. Miller:

Please accept this letter as a status update on Respondents' efforts to obtain the necessary access under Paragraph 72 of the Modified Unilateral Administrative Order for Remedial Investigation/Feasibility Study ("UAO") for this Site and request for additional time to complete this task.

To date, we have secured access to the following properties: Lot 54, Lot 56, Lot 59, Lot 74, Lot 75 and Lots 76 & 77. Regarding Lots 72 & 73, Respondents have submitted for approval, a proposed access agreement to the Brazos River Harbor Navigational District's Board of Directors, which will meet in February to consider same.

In addition, in response to EPA's comments to Respondents' proposed Remedial Investigation & Feasibility Study Work Plan, which were transmitted with Mr. Miller's January 19, 2006, correspondence, Respondents will initiate efforts to secure off-site access to Lots 19 and 20, as well as to appropriate residential properties to the west of Snapper Lane.

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Ms. Barbara A. Nann
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January 30, 2006
Page 2



We will continue our efforts to obtain off-site access agreements for the properties listed above and apprise you of our progress. Considering the recently expanded scope of our off-site access needs, we are asking for a sixty (60) day extension, until March 31, 2006, to complete this task.

Thank you for your attention to this matter. Please let us know if EPA prefers another course of action be taken with respect to securing the necessary access.

Sincerely,

F. William Mahley

FWM/nts

cc: Pamela Travis, EPA Region 6 – Via Hand Delivery & Email
Brent Murray, for Chromalloy American Corp. – Via Email
Jim Morriss, Thompson & Knight, LLP – Via Email
Robert Rouse, The Dow Chemical Company – Via Email
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